

TESTEMONY
OF
FRANK PATRICK CROWLEY
ON
SENATE BILL 68

My name is Frank Patrick Crowley. I am the owner of Crowley Consultants, a small consulting firm here in Helena. I specialize in geology, hydrology, and solid waste management, including composting. I wish to speak in favor of this bill.

It might seem like geology and composting is an odd mix, but during a previous economic downturn, this mining geologist took a job with the DEQ's Solid Waste Program. Each of us in the program was required to develop specialties in solid waste as well as our formal scientific training. One of mine was composting. For 16 years, I was a DEQ expert on the topic of composting. Now that I am retired from the State, I continue to work with the compost facilities. My clients include three of the five large composters in Montana.

While at the DEQ, I assisted the Montana Department of Transportation (MDT) when they approached the DEQ with the problem of how to deal with road kill. With a diminished number of disposal options, they were faced with increasing costs to manage a substantial problem. In the Victor Section alone, a 45 mile stretch of Highway 93, they would kill up to 700 deer a year. Given the housing density, there is almost no place they can simply drag them off to the side of the road and leave them. 700 deer means a lot of trips to the Missoula Landfill, with a pickup full of mangled corpses driving down Reserve Street. And two State employees to unload the truck at the landfill and drive back to Victor, about an hour each way.

After a review of the available literature from the New York Department of Transportation, Ohio State University, and Colorado State University, a plan was developed for a trial facility. The initial plan was for the test facility to be at Clearwater Junction, a nice remote area with few neighbors and lots of road kills. After meeting with the locals, wildlife managers, and the Blackfoot Challenge, MDT decided to do their first trial elsewhere. Victor was chosen because of the number of deer available and it was not in grizzly bear country. If the trial was successful, MDT would apply for a license. If stinky or otherwise objectionable, MDT agreed to remove everything and haul it to the landfill in Missoula. As the regulatory agency, if we received

complaints or found the facility objectionable during inspections, it was done! We developed a plan of operations and MDT commenced operations. The photo of the Victor site is about one-half mile from top to bottom. The facility is under the red X.

After about a year, MDT applied for a license. As part of the process, all of the immediate neighbors were sent a copy of the Environmental Assessment and my phone number as the DEQ contact. I remember some of the calls well, because they were so loud. The neighbors were invited to tour the facility, which had been operating for over a year, on their own or with the MDT person responsible for the site. The closest, and loudest, neighbor owned a business about 500 feet away from the facility. He sent his office manager over to tour the site. She was astonished when told that the curing pile she was standing next to had over 200 deer in it and she was looking at 200 more in processing right in front of her. I also remember the second phone call from the man from Oregon. He did not object to the license.

The Department of Transportation now has nine licensed facilities around Montana. All of them have been through the DEQ's licensing process. The requirements of MEPA were followed in each instance with the notification of the immediate neighbors of record, publication of an Environmental Assessment, and publicizing the possible license issuance in the places specified by law, including the newspaper of record for the local area. For two other sites MDT withdrew the applications because they want to be good neighbors. Neither facility would have imposed adverse effects to human health or the environment, but the perception was there amongst the neighbors.

I recently assisted the Gallatin County West Yellowstone Compost Facility in a license expansion to include a road killed bison management system. The compost will be use for reclamation of road cuts in the West Yellowstone area. I like the idea of "Bison in a Bag, Compost for your Garden" that we could sell to tourists, but all of the compost would already be absorbed by the local demand. Another client facility of mine, a large landfill, is exploring the idea of using carcass composting as a more acceptable way of handling pet mortalities. From dogs and cats to horses, wouldn't someone rather that their pet grew grass and flowers?

We are here today because of a technical point raised by the Fergus County Attorney, as I understand. The law in question was meant to prevent stinking carcasses rotting in the open with the resulting flies and feral scavengers feeding on the corpses. A compost facility

controls these through the use of sawdust, wood chips and the timely injection of water into the piles. All of this results in a controlled process that meets EPA requirements for pathogen reduction without foul odors. The process yields a material with beneficial uses. Please pass this minor amendment. Thank you.



Victor Deer
Compost Site